



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

August 01, 2024

Joseph Sullivan, Site Vice President
Entergy Operations, Inc.
17265 River Road
Killona, LA 70057

SUBJECT: WATERFORD STEAM ELECTRIC STATION, UNIT 3 – NOTIFICATION OF BIENNIAL PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION AND REQUEST FOR INFORMATION (05000382/2024010)

Dear Joseph Sullivan:

During the weeks of October 7 and October 21, 2024, the U.S. Nuclear Regulatory Commission (NRC) will conduct a Biennial Problem Identification and Resolution (PI&R) inspection at your facility. Four inspectors will perform this two-week inspection in accordance with NRC Inspection Procedure 71152, "Problem Identification and Resolution." This inspection focuses on the corrective action program and its implementation to evaluate the station's effectiveness in identifying, prioritizing, evaluating, and correcting problems, and to confirm that the station was complying with NRC regulations and licensee standards. The team also evaluates the station's processes for use of industry and NRC operating experience information and the effectiveness of the station's audits and self-assessments. Finally, the team reviews the station's program to establish and maintain a safety-conscious work environment.

The schedule for the inspection is as follows:

- Offsite Preparation Week: September 23 to 27, 2024
- Onsite Inspection Weeks: October 7 to 11, and October 21 to 25, 2024

To minimize the inspection impact on the site and to ensure a productive inspection for both parties, we have enclosed a request for information. It is important that all these documents are up-to-date and complete to minimize the number of additional documents requested during the preparation and/or the on-site portions of the inspection. Please provide this information electronically to the lead inspector.

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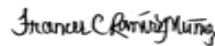
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Sincerely,



Signed by Ramirez Munoz, Frances
on 08/01/24

Frances C. Ramirez, Team Lead
Inspection Program & Assessment Team
Division of Operating Reactor Safety

Docket No. 0500382
License No. NPF-38

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV

WATERFORD STEAM ELECTRIC STATION, UNIT 3 – NOTIFICATION OF BIENNIAL PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION AND REQUEST FOR INFORMATION (05000382/2024010) – DATED AUGUST 01, 2024

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DOCUMENT NAME: WATERFORD STEAM ELECTRIC STATION, UNIT 3 – NOTIFICATION OF BIENNIAL PROBLEM IDENTIFICATION AND RESOLUTION INSPECTION AND REQUEST FOR INFORMATION (05000382/2024010)

ADAMS ACCESSION NUMBER: **ML24213A163**

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Information Request
Biennial Problem Identification and Resolution
Inspection
Waterford Steam Electric Station
August 1, 2024

Inspection Report: 05000382/2024010

Onsite Inspection Dates: October 7 to 11, and October 21 to 25, 2024

This inspection will cover the period from April 1, 2022, through October 25, 2024. All requested information is limited to this period or to the date of this request unless otherwise specified. To the extent possible, the requested information should be provided electronically in word-searchable Adobe PDF (preferred) or Microsoft Office format. To ensure appropriate handling, if you determine that any requested information is sensitive, the specific handling of this information should be discussed in advance between the NRC inspectors and the Waterford representatives assigned to the Problem Identification and Resolution Inspection.

All requested documents should be provided electronically (e.g., Certrec's IMS) where possible. If an online inspection management system is used to provide the requested information, please ensure that all uploaded documents are searchable by title and identification number (for example, CR 1234567).

Lists of documents ("summary lists") should be provided in Microsoft Excel or a similar sortable format. Please be prepared to provide any significant updates to this information by September 30, 2024, and as new information becomes available throughout the inspection. As used in this request, "corrective action documents" refers to condition reports, notifications, action requests, cause evaluations, and/or other similar documents, as applicable to Waterford.

Please provide the following information no later than September 20, 2024:

1. Document Lists

Note: For these summary lists, please include the document/reference number, the document title, initiation date, current status, and long-text description of the issue.

- a. Summary list of all corrective action documents related to significant conditions adverse to quality that were opened, closed, or evaluated during the period; if fewer than approximately 20, provide full documents and attachments
- b. Summary list of all corrective action documents related to conditions adverse to quality that were opened or closed during the period
- c. Summary list of all condition reports related to non-conditions adverse to quality that were opened or closed during the period
- d. Summary list of all apparent cause evaluations (or equivalent) performed during the period; if fewer than approximately 40, provide full documents and attachments

Enclosure

- e. Summary list of all currently open corrective action documents associated with conditions first identified prior to the beginning of the inspection period; if fewer than approximately 20, provide full documents and attachments and the summary list
- f. Summary list of all corrective action documents that were upgraded or downgraded in priority/significance during the period (these may be limited to those downgraded from, or upgraded to, apparent cause level or higher); if fewer than approximately 20, provide full documents and attachments and the summary list
- g. Summary list of all corrective action documents initiated during the period that identify an adverse or potentially adverse trend in safety-related or risk-significant equipment performance or in any aspect of the station's safety culture; if fewer than approximately 20, provide full documents and attachments and the summary list
- h. Summary lists of operator workarounds, operator burdens, temporary modifications, and control room deficiencies (1) currently open and (2) that were evaluated and/or closed during the period; this should include the date that each item was opened and/or closed; if fewer than approximately 20, provide full documents and attachments and the summary list
- i. Summary list of all prompt operability determinations or other engineering evaluations (or equivalent) to provide reasonable assurance of operability; if fewer than approximately 20, provide full documents and attachments
- j. Summary list of plant safety issues raised or addressed by the Employee Concerns Program (or equivalent) (sensitive information should be made available by appropriate means after discussion with the team lead)

2. Full Documents with Attachments

- a. All root cause evaluations completed during the period; include a list of any planned or in progress (if this information is fully included in item 1.a, it need not be provided separately)
- b. Quality Assurance audits performed during the period
- c. Audits/surveillances performed during the period on the Corrective Action Program, of individual corrective actions, or of cause evaluations
- d. Functional area self-assessments and non-NRC third-party assessments (e.g., peer assessments performed as part of routine or focused station self- and independent assessment activities; do not include INPO assessments) that were performed or completed during the period; include a list of those that are currently in progress

- e. Any assessments of the safety conscious work environment at Waterford including any safety culture survey results; if none performed during the inspection period, provide the most recent assessments and/or survey results
- f. Corrective action documents generated during the period associated with the following:
 - i. NRC findings and/or violations issued to Waterford
 - ii. Licensee Event Reports issued by Waterford

Please provide a crosswalk or key tying corrective action documents to specific findings or violations.

- g. Corrective action documents generated for the following, if they were determined to be applicable to Waterford (for those that were evaluated but determined not to be applicable, provide a summary list; if fewer than approximately 20, provide full documents and attachments and the summary list):
 - i. NRC Information Notices, Bulletins, and Generic Letters issued or evaluated during the period
 - ii. Part 21 reports issued or evaluated during the period
 - iii. Vendor safety information letters (or equivalent) issued or evaluated during the period
 - iv. Other external events and/or operating experience evaluated for applicability during the period
- h. Corrective action documents generated for the following:
 - i. Maintenance preventable functional failures that occurred or were evaluated during the period
 - ii. Adverse trends in equipment, processes, procedures, or programs that were evaluated during the period
 - iii. Action items generated or addressed by offsite review committees during the period

3. Logs and Reports

- a. Corrective action performance trending/tracking information generated during the period and broken down by functional organization (if this information is fully included in item 3.b, it need not be provided separately)

- b. Current system health reports, Management Review Meeting packages, or similar information; provide past reports as necessary to include greater-than-or-equal to 12 months of metric/trending data
- c. Radiation protection event logs during the period
- d. Security event logs and security incidents during the period (sensitive information should be made available during the team's first week—do not provide electronically) – Handling of this item will need additional discussion
- e. Employee Concerns Program (or equivalent) logs (sensitive information should be made available during the team's first week of inspection—do not provide electronically)
- f. List of training deficiencies, requests for training improvements, and simulator deficiencies for the period
- g. Control room logs during the period

Note: For items 3.c and 3.d, if there is no log or report maintained separate from the corrective action program, please provide a summary list of corrective action program items for the category described.

4. Procedures

Note: For these procedures, please include all revisions that were in effect at any time during the period.

- a. Corrective action program procedures, to include initiation and evaluation procedures, operability determination procedures, cause evaluation procedures, and any other procedures that implement the corrective action program at the station, including applicable corporate procedures
- b. Quality Assurance program procedures (specific audit procedures are not necessary)
- c. Employee Concerns Program (or equivalent) procedures
- d. Procedures that implement/maintain a Safety Conscious Work Environment
- e. Conduct of Operations procedure (or equivalent) and any other procedures or policies governing control room conduct, operator burdens and workarounds, etc.
- f. Maintenance rule procedures and any procedures implementing any portion of the maintenance rule at the station
- g. Operating experience program procedures and any other procedures or guidance documents that describe the site's use of operating experience information

- h. Procedures associated with the 10 CFR Part 21 program
5. Other
- a. List of risk-significant components and systems, ranked by risk worth; if the list uses system designators, provide a list of the associated equipment/system names
 - b. List of structures, systems and components and/or functions that were in maintenance rule (a)(1) status or evaluated for (a)(1) status at any time during the inspection period; include dates and results of expert panel reviews and dates of status changes
 - c. Organization charts for plant staff and long-term/permanent contractors
 - d. Electronic copies of the Updated Final Safety Analysis Report (or equivalent), technical specifications, and technical specification bases, if available
 - e. Table showing the number of corrective action documents (or equivalent) initiated during each month of the inspection period, by screened significance
 - f. Table showing the number of anonymous corrective action documents (or equivalent) initiated during each month of the inspection period; if fewer than approximately 40, provide full documents and attachments
 - g. For each day the team is inspecting, provide the following:
 - i. Planned work/maintenance schedule for the station
 - ii. Schedule of management, maintenance rule, corrective action related, or corrective action review meetings (e.g. operations focus meetings, condition report screening meetings, Corrective Action Review Boards, Management Review Meetings, challenge meetings for cause evaluations, etc.)
 - iii. Agendas and materials for these meetings
 - h. Provide a copy of Waterford's probabilistic risk assessment (PRA) summary document for the current internal events, external events (e.g., fire, flooding, seismic), and shutdown PRA models of record, as applicable.
6. Focused System or Area Review(s) (system to be designed at a later date)
- a. System design basis documents
 - b. Quarterly system health reports, maintenance rule determinations, 50.59 screens/evaluations, apparent and root cause evaluations
 - c. Condition reports associated with the system

- d. Engineering walkdown schedule
- e. Operating Procedures/Abnormal Operating Procedures/Emergency Operating Procedures
- f. Work orders from system maintenance outages

Please note that system or areas for increased inspection focus will be identified in the coming weeks, and additional documentation may be requested. The inspection for the focused system will cover the period from April 1, 2019, to October 25, 2024.

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